



August 31, 2015

The Federal Communications Commission
Filed electronically at <http://apps.fcc.gov/ecfs/>

RE: WC Docket Nos. 11-42, 09-197, 10-90; FCC 15-71
Lifeline and Link Up Reform and Modernization Telecommunications
Carriers Eligible for Universal Service Support, Connect America Fund

To Whom It May Concern:

I am writing on behalf of Molina Healthcare, Inc. ("Molina") in response to the proposed rule "Lifeline and Link Up Reform and Modernization Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund" published in the July 17, 2015 Federal Register (80 FR 42670). Molina was founded 35 years ago to provide quality health services to financially vulnerable families and individuals covered by government programs. Molina currently serves over three million Medicaid members in eleven states and Puerto Rico. We also participate in the health insurance Marketplaces in nine states, and offer a dual eligible special needs plan through the Medicare Advantage program. Additionally, in support of our health plan mission, Molina has more than twenty clinics across the country that provide care to under-served communities.

Our comments are in response to the question posed in paragraph 107 asking "What would be the impact on Medicaid recipients if households could no longer qualify for Lifeline support through Medicaid?" We understand the FCC is asking this question as part of their continuous effort to streamline the program and reduce the administrative burden of verifying a consumer's eligibility for the program by possibly limiting the federal assistance programs through which individuals can qualify for Lifeline support, with a preference for the Supplemental Nutrition Assistance Program (SNAP). Molina urges the FCC not to consider such an approach. Research shows that while there is significant overlap between SNAP and Medicaid-eligible individuals, the participation rates for SNAP can be extremely low, resulting in eligible individuals who would greatly benefit from the Lifeline program to fall through the cracks¹.

One of the biggest challenges Medicaid health plans like Molina face is the ability to directly communicate and engage with our members. Medicaid eligible individuals may

¹ See for example Stan Dorn, et. al., "Overlapping Eligibility and Enrollment: Human Services and Health Programs Under the Affordable Care Act". Prepared for the Office of the Assistant Secretary for Planning and Evaluation, DHHS (December 23, 2013). Found at http://aspe.hhs.gov/sites/default/files/pdf/76961/rpt_integrationproject.pdf

be less likely to have stable housing and reliable phone access. By facilitating access to wireless technology, the Lifeline program is a critical component of Molina's strategy to meet the health care needs of our members.

The proposed rule notes the benefits and security that voice service brings, including access to health care, and health text messaging is an increasingly valuable tool for managing care. A 2014 environmental scan of studies on the effectiveness and acceptance of health text messaging interventions produced for the U.S. Department of Health and Human Services concludes that research shows the value of health text messaging programs in a variety of areas including disease management, medication adherence, immunization rates, and clinical outcomes.² Molina is using health text messaging to promote maternal and child health. Through the Text4baby program, pregnant women and new moms receive reminders about upcoming medical appointments and helpful tips and information on car seat safety, healthy eating and resource hotlines and website. Molina is working hard to improve member interactions through text messaging and enabling Molina members to communicate more efficiently with their health plan and providers.

Thank you for the opportunity to provide comments. We strongly urge the Commission to continue having policies in place that maximize access to wireless technology by keeping the Medicaid pathway to eligibility for the Lifeline program.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Puente", with a stylized flourish at the end.

John M. Puente
Vice President, Regulatory Affairs

² U.S. Department of Health and Human Services. Health Resources and Services Administration. Using Health Text Messages to Improve Consumer Health Knowledge, Behaviors, and Outcomes: An Environmental Scan. Rockville, Maryland: U.S. Department of Health and Human Services, 2014, available at: <http://www.hrsa.gov/healthit/txt4tots/environmentalscan.pdf>